

0045317

DON'T SAY IT --- *Write It!*

DATE: September 17, 1996

TO: Ellen M. Mattlin (RL) A5-15

FROM: J. C. Sonnichsen, Jr. H6-23

Telephone: 376-9956

CC: D. H. Chapin N2-36
T. A. Dillhoff N2-57
F. A. Ruck III H6-23
Administrative Record H6-08
JCS: File H6-23

SUBJECT:

3718-F Closure: P. E. Certification and FY 1996 Status Report

Copies of the Professional Engineer's Certification and the FY 1996 status report on the 3718-F Alkali Metal Treatment and Storage Facility are attached for your information.

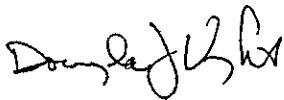
If you have any questions please don't hesitate to call me. Thank you for your attention.



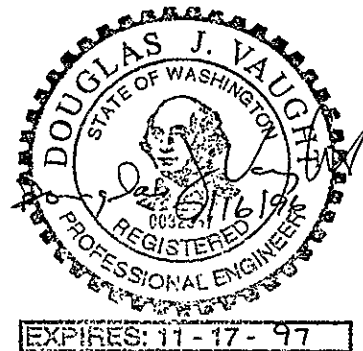
PROFESSIONAL ENGINEER'S CERTIFICATION STATEMENT
3718-F ALKALI METAL TREATMENT AND
STORAGE FACILITY CLOSURE PLAN CERTIFICATION

I, the undersigned, an independent registered Professional Engineer, hereby certify that I have reviewed the approved Closure Plan (DOE/RL-91-35, Revision 2) and supporting documentation for the 3718-F Alkali Metal Treatment and Storage Facility on the Hanford Site, Washington. To the best of my information and belief, closure activities were performed in accordance with the specifications in the approved Closure Plan, as discussed in the attached Specifications and Limitations of Professional Engineer's Certification. This certification is based solely on interviews, an inspection of the facility, and my review of the pertinent documents.

The above statements are true and complete to the best of my knowledge and within the limits of professional judgment under the prevailing standards of practice on this 16th day of July, 1996.



Douglas J. Vaught, P.E.
Washington #32367
CH2M HILL, Inc.



SPECIFICATIONS AND LIMITATIONS OF
PROFESSIONAL ENGINEER'S CERTIFICATION
3718-F ALKALI METAL TREATMENT AND
STORAGE FACILITY CLOSURE PLAN CERTIFICATION

The 3718-F Alkali Metal Treatment and Storage Facility was closed under the direction of Westinghouse Hanford Company (WHC) employees from 1995 to 1996. Closure activities were conducted in accordance with a document entitled *The 3718-F Alkali Metal Treatment and Storage Facility Closure Plan* (DOE/RL-91-35, Revision 2), published November 1995.

In a letter to Mr. James Rasmussen of the U.S. Department of Energy, dated January 30, 1996, Mr. Clinton D. Stuart of the Washington State Department of Ecology (Ecology) determined the Closure Plan to be complete and accurate as required by WAC 173-303 and stated it will be included in the Second Modification to the (Hanford) Facility Wide Permit, scheduled for summer, 1996. Final acceptance of the closure by Ecology is pending the public comment process of the permit modification.

Douglas J. Vaught, P.E., was provided, or obtained through the Administrative Record, the approved Closure Plan and other documents listed in the accompanying Documents Reviewed for Professional Engineer's Certification. The contacts at WHC for Mr. Vaught were Mr. Jack C. Sonnichsen and Ms. Andrea L. Prignano, Ph.D. of the RCRA Permitting organization. These documents were provided to Mr. Vaught as the full, accurate, complete, and representative record of closure activities performed by WHC personnel at the 3718-F Facility.

Mr. Vaught performed a review of the documents provided to determine if the 3718-F Facility was closed in accordance with the Closure Plan. In addition, Mr. Vaught, accompanied by Mr. Sonnichsen and a WHC site representative, inspected the 3718-F Facility on November 21, 1995 to verify the results of a regulatory personnel inspection conducted on October 5, 1995. Mr. Vaught, accompanied by Mr. Sonnichsen and Ms. Prignano, inspected the 3718-F Facility again on June 11, 1996 and noted no deficiencies with respect to compliance with the Closure Plan. Because the Closure Plan did not contain provisions for analytical sampling, no chemistry data and/or validation was reviewed.

DOCUMENTS REVIEWED FOR
PROFESSIONAL ENGINEER'S CERTIFICATION
3718-F ALKALI METAL TREATMENT AND
STORAGE FACILITY CLOSURE PLAN CERTIFICATION

1. The 3718-F Alkali Metal Treatment and Storage Facility Closure Plan (DOE/RL-91-35, Revision 2).
2. Unit Manager's Meeting minutes from meeting held October 26, 1995, attended by representatives of WHC, Dames & Moore, DOE-RL, and the Dept. of Ecology.
3. Letter from Clinton D. Stuart, Washington State Department of Ecology, to Mr. James Rasmussen, U.S. Department of Energy, dated January 30, 1996 regarding: 3718-F Alkali Metal Treatment and Storage Facility Closure Plan (DOE/RL-91-35, Revision 2, November 1995, TSD: TS-3-3).
4. Summary of Inspection, 3718-F Alkali Metal Treatment and Storage Facility, October 5, 1995.
5. Figure 7-1 (from *The 3718-F ... Closure Plan*), 3718-F Alkali Metal Treatment and Storage Inspection Checklist for Carbonates Above Action Levels (copy of form signed and dated October 5, 1995).

Westinghouse Hanford Company

Internal Memo

From: FFTF Regulatory Compliance
Phone: 376-0441 N2-57
Date: September 13, 1996
Subject: 3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY
CLOSURE PLAN - STATUS REPORT

RC:96-005

To: E. F. Loika N2-51
cc: D. B. Klos N2-51
S. W. Scott N2-57
J. C. Sonnichsen H6-24
TAD:File/LB

This memo is to provide the FFTF Transition Project office with an FY 1996 status report on the 3718-F Alkali Metal Treatment and Storage Facility RCRA closure plan. This status report will fulfill the requirement of Milestone B69-96-202 for cost account 1B6902, NE RCRA Closures.

HISTORY

The 3718-F Facility is located in the southeast portion of the 300 Controlled Access Area. It consists of a single-story storage building, adjoining concrete pad, treatment equipment, and a fume scrubber. The 3718-F Facility treated alkali metal waste, such as sodium, sodium potassium alloy and lithium from 1968 until 1987. The operations of the facility are described in Chapter 3.0, "Process Information," of the closure plan. There is no alkali metal waste, or other waste, currently stored in this facility.

Milestone M-20-18, contained in the Tri-Party Agreement, required that a RCRA closure plan for the 3718-F Facility be submitted to the state and federal regulators by December 1991. This milestone was met on time by WHC FFTF/FMEF Programs and RCRA Closures groups.

FACILITY STATUS

The 3718-F Facility is managed by the 340 Facility Operations group. This group performs required surveillances of the facility. They also maintain the appropriate documentation for facility activities and inspections. The 3718-F Facility has remained in a safe configuration during FY 1996. On September 8, 1995, Ecology issued a letter authorizing the weekly inspection frequency to be reduced to semiannual. This decision was based on the fact that there is no dangerous waste in the facility, access is controlled, and closure efforts are under way. When support is required for facility tours by regulators and others, 340 Facility personnel also perform this function.

340 Facility Operations personnel are intending to demolish the facility in the near future. This action was reviewed by Ecology, and is deemed acceptable.

AUDITS AND REGULATOR TOURS

On October 5, 1995, an inspection team comprised of Ecology, RL, and WHC subject matter experts was assembled to determine the hazardous waste contamination status of the facility. This team thoroughly inspected all aspects of the facility and found no contamination that required remediation.

In November 1995 and June 1996, an independent Professional Engineer inspected the facility for the purpose of verifying compliance with the 3718-F closure plan. The Professional Engineer issued a letter on July 16, 1996, certifying that the closure had been properly performed.

Ecology personnel inspected the facility in July 1996 to determine compliance with RCRA regulations. Findings were issued as a result of these inspections, and were resolved by 340 Facility Operations personnel. The Ecology inspectors also questioned the fact that the closure plan did not require soil sampling to verify no soil contamination. In the initial Data Quality Objective (DQO) meeting, RL, Ecology, and WHC personnel had determined that soil sampling was unnecessary. Current Ecology personnel consider this to be unacceptable, and are providing language in Modification B to the Hanford Facility RCRA permit to revisit this issue.

FACILITY CLOSURE PLAN STATUS

There have been three Unit Manager Meetings and the DQO meeting in FY 1996. During the DQO meeting it was decided that the only sample needed would be from the dust inside the building and this sample would only be needed if the sample taken at 4843 showed any alkali metal reaction products. 3718-F stored the same material inside the building as 4843. The reaction area of the facility is outside. Ecology agreed that there was no need to obtain any samples from the reaction area as any alkali metal or reaction product would have long since been dissipated by nature (wind, rain, snow, ice).

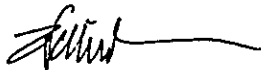
Ecology issued a letter to accept the closure plan on January 30, 1996. The results of the inspection performed by Ecology, RL and WHC personnel in October 1995 determined that there was no contamination in the facility which required remediation. An independent Professional Engineer certified in July 1996 that closure activities had been performed in accordance with the approved closure plan. Since then Ecology has questioned the lack of soil sampling as part of the RCRA closure. Even though the DQO process determined that soil sampling was unnecessary, Ecology wishes to revisit this issue and Modification B of the Hanford Facility RCRA permit will contain language which requires the soil sampling question to be addressed.

Future plans call for 3718-F closure to be referenced in Modification B to the Hanford Facility RCRA permit. This modification will be issued for

E. F. Loika
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public comment, and then implemented. It is likely that a new DQO process will be initiated to determine the extent and requirements for soil sampling, and following receipt of the sample analysis, closure certification of the facility will be performed. If the samples show contamination from hazardous constituents used at 3718-F, remediation of the soils may be necessary. The 340 Facility Operations personnel are intending to have the facility demolished in the near future, leaving the concrete pad intact. This action has been determined acceptable by Ecology.



T. A. Dillhoff, Team Leader
Regulatory Compliance

klc